

1 Nico Banks (CA SBN:344705)  
2 **BANKS LAW OFFICE**  
3 712 H St NE, Unit #8571  
4 Washington, DC 20002  
5 Tel.: 971-678-0036  
6 Email: [nico@bankslawoffice.com](mailto:nico@bankslawoffice.com)

7 Richard A. Nervig (CA SBN:226449)  
8 **RICHARD A. NERVIG, P.C.**  
9 501 West Broadway, Suite 800  
10 San Diego, CA 92101  
11 Phone: 760-451-2300  
12 Email: [richard@nerviglaw.com](mailto:richard@nerviglaw.com)

13 *Attorneys for Plaintiffs*

14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 DAVID HOUGH; *et al.*

17 Plaintiffs,

18 vs.

19 RYAN CARROLL; *et al.*

20 Defendants.

Case No.: 2:24-cv-02886-WLH

**AFFIDAVIT OF PLAINTIFFS’  
ATTORNEY NICO BANKS  
SUPPORTING PLAINTIFFS’  
REPLY BRIEF RE: MOTION TO  
COMPEL WELLS FARGO**

21  
22  
23 **AFFIDAVIT OF PLAINTIFFS’ ATTORNEY NICO BANKS SUPPORTING**  
24 **PLAINTIFFS’ REPLY BRIEF RE: MOTION TO COMPEL WELLS FARGO**

25 I, Nico Banks, have personal knowledge of the matters set forth below and if called to  
26 testify, I would do so competently.

27  
28 1. I am an attorney representing Plaintiffs in this matter.

1 2. Exhibit A is a true and correct copy of an email that I exchanged with counsel  
2 for Wells Fargo Bank, N.A.

3 3. Exhibit B is a true and correct copy of the attachment to the Exhibit A email.  
4  
5 This attachment is a “redline” which shows the edits that Wells Fargo Bank,  
6 N.A. proposed to the stipulation.

7 4. Plaintiffs emailed Wells Fargo’s counsel a courtesy copy of the original  
8 subpoena at issue in this case on May 17, 2024.  
9

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Dated: August 14, 2024  
12

13 /s/Nico Banks

14 /S/ Nico Banks

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24 San Diego, CA 92101

25 Phone: 760-451-2300

26 Email: [richard@nerviglaw.com](mailto:richard@nerviglaw.com)

27 *Attorneys for Plaintiffs*  
28